

**IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF PENNSYLVANIA  
HARRISBURG DIVISION**

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JUDICIAL WATCH, INC.,

Plaintiff,

v.

COMMONWEALTH of  
PENNSYLVANIA, et al.,

Defendants.

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NO. 1:20-cv-00708  
(Judge Christopher C. Conner)

**MOTION TO DISMISS OF THE COUNTY DEFENDANTS**

Defendants Bucks County Commission, Bucks County Board of Elections, Bucks County Registration Commission, Thomas Freitag, in his official capacity as Elections Director for Bucks County, Chester County Commission, Chester County Board of Elections, Chester County Registration Commission, Sandra Burke, in her official capacity as Director of Elections in Chester County, Delaware County Council, Delaware County Board of Elections, Delaware County Registration Commission, and Laureen Hagan, in her official capacity as Chief Clerk, Elections Bureau for Delaware County (the “County Defendants”), hereby move this Court for an order dismissing the claims asserted against them in the

Complaint. The grounds for this Motion are set forth in the accompanying Memorandum of Law, which is incorporated by reference.

WHEREFORE, the County Defendants respectfully request that the Court grant this Motion and dismiss the claims asserted against them in the Complaint.

Respectfully,

Date: July 10, 2020

HANGLEY ARONCHICK SEGAL  
PUDLIN & SCHILLER

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